UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF VIRGINIA ROANOKE DIVISION

DANIEL NOTESTEIN, BLOCKTRADES INTERNATIONAL, LTD., ANDREW CHANEY, SZYMON LAPINSKI, ADAM DODSON, ELMER LIN, DANIEL HENSLEY, MICHAEL WOLF, MATHIEU GAGNON, and MARTIN LEES,

Plaintiffs/Counter-Defendants,

v. Civil Action No.: 7:20CV00342 BITTREX, INC., and Defendant/Counter-Plaintiff, STEEMIT, INC., Defendant. BITTREX, INC., Cross-Plaintiff, v. STEEMIT, INC., Third-Party Defendant/Counter-Plaintiff. STEEMIT, INC., Cross-Plaintiff, v. JOHN DOES 1-10,

Third-Party Defendants.

STIPULATION AND [PROPOSED] ORDER EXTENDING TIME TO RESPOND TO PLAINTIFFS' AMENDED COMPLAINT

IT IS HEREBY STIPULATED, by and among Plaintiffs/Counter-Defendants

("Plaintiffs") and Defendant Steemit, Inc. ("Steemit"), through the undersigned counsel, as

follows:

WHEREAS, by order filed March 30, 2022 (the "Order"), the Court granted Bittrex,

Inc.'s motion for approval of interpleader bond and judgment of interpleader;

WHEREAS, the Order also granted, in part, Plaintiffs' motion for leave to file an

amended complaint to the extent Plaintiffs sought to allege a conversion claim against Steemit;

WHEREAS, Plaintiffs filed their Amended Complaint on April 13, 2022;

WHEREAS, Steemit's response to the Amended Complaint is due April 27, 2022;

WHEREAS, Plaintiffs and Steemit have met and conferred and agree that a thirty-day

extension of time to respond is reasonable;

NOW THEREFORE, Plaintiffs and Steemit stipulate and agree, subject to the Court's

approval, that Steemit's deadline to respond to the Amended Complaint shall be extended for

thirty (30) days, to May 27, 2022.

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated:	
	Hon. Elizabeth K. Dillon
	United States District Judge

Dated: April [], 2022

DANIEL NOTESTEIN, BLOCKTRADES INTERNATIONAL, LTD., ANDREW CHANEY, SZYMON LAPINSKI, ADAM DODSON, ELMER LIN, DANIEL HENSLEY, MICHAEL WOLF, MATHIEU GAGNON, and MARTIN LEES

By: /s/Paul G. Beers

Paul G. Beers (VSB No. 26725) GLENN, FELDMANN, DARBY & GOODLATTE 37 Campbell Avenue, S.W. P.O. Box 2887 Roanoke, VA 24001-2887 Phone: (540) 224-8000 Fax: (540) 224-8050

Counsel for Plaintiffs

pbeers@glennfeldmann.com

Dated: April [], 2022

STEEMIT, INC.

By: /s/ Michael S. Dicke

Michael S. Dicke (Cal. Bar No. 158187)

(admitted *pro hac vice*)

Catherine Kevane (Cal. Bar No. 215501)

(admitted *pro hac vice*)

Jennifer C. Bretan (Cal. Bar. No. 233475)

(admitted *pro hac vice*)

Casey O'Neill (Cal. Bar No. 264406)

(admitted *pro hac vice*)

FENWICK & WEST LLP

555 California Street, 12th Floor

San Francisco, CA 94114

Telephone: (415) 875-2300

Fax: (415) 281-1350

mdicke@fenwick.com

ckevane@fenwick.com

jbretan@fenwick.com

coneill@fenwick.com

Michael J. Finney (VSB No. 78484)

GENTRY LOCKE

10 Franklin Road S.E., Suite 900

P.O. Box 40013

Roanoke, Virginia 24022-0013

Phone: (540) 983-9300 Fax: (540) 983-9400 finney@gentrylocke.com

Counsel for Steemit, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of April 2022, a true and correct copy of the foregoing was filed with the Clerk of Court using the CM/ECF system, which provided electronic service to all counsel of record.

/s/ Michael J. Finney
